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August 16, 2023

VIA EMAIL

The Honorable George C. Hanks, Jr.
United States District Judge
United States Courthouse
515 Rusk Street, Room 6206
Houston, Texas 77002

Re: *In re Alta Mesa Resources, Inc. Sec. Litig.* No. 19-CV-00957 (consolidated)

Dear Judge Hanks:

Pursuant to Your Honor's request at the discovery hearing this morning, attached please find a copy of:¹

- *Alta Mesa Resources Inc. 's Responses and Objections to Lead Plaintiffs' First Set of Interrogatories.* To assist the Court, we have highlighted the instances where Alta Mesa Resources Inc. ("AMR") declined to provide substantive answers to interrogatories 3 through 16; and
- The transcript of Plaintiffs' June 27, 2023 Rule 30(b)(6) deposition of Alta Mesa Resources Inc. To assist the Court, we note examples on page 158-160 of the questions and answers regarding AMR's denials to paragraphs 84 and 85 in the complaint. Similar examples of where the witness is unable to provide the actual factual basis underlying whatever directions AMR received from counsel relative other denials appear on pages 163-190. Testimony where the witness is unable to provide the factual basis for any of the affirmative defenses appears on pages 193-198. To be clear, Plaintiffs do not seek testimony regarding any protected communications, but simply the facts underlying the denials and affirmative defenses whether known to counsel or any other former employee, which facts themselves are not protected.

We thank the Court for its attention to this matter and are available to answer any questions.

¹ This letter is being filed on ECF. However, the attachments are designated as confidential and are being sent to the Court and counsel via emails but not filed on ECF.

Respectfully submitted,

/s/ Andrew J. Entwistle

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cc. ECF (without attachments)
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